

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

vs.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For The
State Of Texas,

Defendant.

Case No.: 1:23-cv-00917-DAE

DECLARATION OF PHILIPPE CRAVEIRO-ROMÃO IN SUPPORT OF PLAINTIFFS'
MOTION FOR EXPEDITED PRELIMINARY INJUNCTION

I, Philippe Craveiro-Romão, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

MEDIAME SRL

2. I hold the position of Chief Operating Officer at MediaME SRL, a limited liability company organized under the laws of Romania, that operates the website Porndoe.com (“Porndoe”).

3. Porndoe is a website that hosts adult content created by third party studios from around the world. Porndoe is available to the entire world of internet users, setting aside age or country censorship filters, and is available in almost all countries. The content on Porndoe is available to users free of charge. Porndoe makes money through advertising placements on its website and through referral fees generated from certain advertisements placed by third party content creators.

4. The content on Porndoe includes “soft core” content, including nude modeling with no penetration or masturbation.

5. I have reviewed the Declaration of Erik Cabrera, in particular his statement that Porndoe features “original” or “exclusive” content. Cabrera Decl. at ¶ 13. If Mr. Cabrera is interpreting these terms to mean that Porndoe produced or created the content, he is mistaken. These terms mean that the content is available only on Porndoe.

6. Porndoe strongly disagrees with the statements that the Act would require it to make on its website:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING:

Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

7. Porndoe also strongly disagrees with the Act's requirement to post the following message at the bottom of every webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-BASED ORGANIZATIONS.

8. Porndoe cooperates with parental filtering software by including a meta tag in its coding that designates its content as "RTA" (Restricted to Adults). By including this meta tag, parental control filters can easily identify Porndoe as an adult content site and block access.

9. The Terms and Conditions for Porndoe make clear that individuals under the age of eighteen are not authorized to access the website.

MIDUS HOLDINGS, LLC

10. I hold the position of Chief Operating Officer at Midus Holdings, LLC, a limited liability company organized under the laws of Florida, that operates the websites Letsdoeit.com ("Letsdoeit") and Superbe.com ("Superbe") within the United States.

11. Letsdoeit is a website that hosts adult content created and owned by RentneR Limited, a content production company organized under the laws of Malta. The content on Letsdoeit includes "soft core" content, including nude modeling with no penetration or masturbation.

12. Superbe is a website that hosts adult content created and owned by RentneR Limited, a content production company organized under the laws of Malta. The content on Superbe is exclusively "soft core," primarily in the form of nude modeling.

13. Letsdoeit and Superbe strongly disagree with the statements that the Act would require them to make on their websites:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING: Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

14. Letsdoeit and Superbe also strongly disagree with the Act's requirement to post the following message at the bottom of every webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-BASED ORGANIZATIONS.

15. Letsdoeit and Superbe cooperate with parental filtering software by including a meta tag in their coding that designates their content as "RTA" (Restricted to Adults). By including this meta tag, parental control filters can easily identify Letsdoeit and Superbe as adult content sites and block access.

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16. The Terms and Conditions for Letsdoeit and Superbe make clear that individuals under the age of eighteen are not authorized to access the websites.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 21, 2023 in Bucharest, Romania.

Dated: August 21, 2023

/s/ *Philippe Craveiro-Romão*
Philippe Craveiro-Romão